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Counsel for Plaintiff Epic Games, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

*Match Group, LLC et al. v. Google LLC et
al.*, Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF LAUREN A.
MOSKOWITZ IN SUPPORT OF EPIC
GAMES, INC.'S AND MATCH GROUP,
LLC ET AL.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

Date: November 17, 2022 at 10:00 a.m.
Courtroom: 11, 19th Floor
Judge: Hon. James Donato

1 I, Lauren A. Moskowitz, declare as follows:

2 1. I am a partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc.
3 (“Epic”) in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I submit this declaration pursuant to Civil Local Rule 79-5. The contents of this
5 declaration are based on my personal knowledge.

6 3. Epic’s and Match’s Reply in Support of Motion to Amend Complaints (the
7 “Reply”), the Declaration of Michael J. Zaken (“Zaken Declaration”) and the accompanying
8 exhibits (“Exhibits”) contain portions that are sourced from materials that Defendants Google
9 LLC, Google Ireland Limited, Google Commerce Limited, Google Asia Pacific Pte. Limited,
10 and Google Payment Corp. (collectively, “Google”), and non-party Activision Blizzard, Inc.,
11 have designated as “CONFIDENTIAL”, “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
12 ONLY” or “NON-PARTY HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES
13 ONLY”, pursuant to the operative Protective Orders entered by the Court, Case No. 3:21-md-
14 02981-JD, ECF Nos. 247, 248, and 249. The following table shows the portions of Epic’s and
15 Match’s Reply, the Zaken Declaration and its Exhibits that contain information designated as
16 “CONFIDENTIAL”, “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” or “NON-
17 PARTY HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY”.

Document	Portion Containing Designated Information	Designating Party
Epic Games Inc.'s and Match Group, LLC et al.'s Reply in Support of Motion to Amend Complaints ("Reply")	Page 3, Lines 25-26 (between "allege" and end of sentence)	Google
Reply	Page 3, Line 28 (between "least" and "Project")	Google
Reply	Page 4, Line 4 (between "developer" and "was")	Google
Reply	Page 4, Lines 4-5 (between "order" and "(ECF No. 344-04)")	Google
Reply	Page 4, Line 5 (between "developer" and "told")	Google
Reply	Page 4, Line 6 (between "if" and "(ECF No. 344-03)")	Google
Reply	Page 4, Line 21 to Page 5, Line 2 (between "Ex. D," and " <i>see also</i> ")	Activision Blizzard, Inc.
Reply	Page 5, Lines 3-4 (between "that" and "and")	Activision Blizzard, Inc.
Reply	Page 5, Lines 4-5 (between "and" and end of sentence)	Activision Blizzard, Inc.
Reply	Page 7, Line 28 to Page 8, Line 2 (between "that" and end of sentence)	Google
Reply	Page 7, Lines 14-15 (between "allege" and end of sentence)	Google
Reply	Page 8, Lines 23-24 (between "that" and end of sentence)	Google
Reply	Page 9, Footnote 6 (between "oath" and end of sentence)	Google

DECLARATION OF LAUREN A. MOSKOWITZ
 IN SUPPORT OF EPIC'S AND MATCH'S ADMINISTRATIVE MOTION
 Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:22-cv-02746-JD

1	Reply	Page 9, Footnote 6 (between “Ex. B,” and “Dep.”)	Google
2			
3	Reply	Page 9, Footnote 6 (between “Ex. C,” and “Dep.”)	Google
4			
5	Declaration of Michael J. Zaken in support of Epic Games Inc.’s and Match Group, LLC et al.’s Reply in Support of Motion to Amend Complaints (“Zaken Declaration”)	¶ 4	Google
6			
7			
8	Zaken Declaration	¶ 5	Google
9			
10	Zaken Declaration	¶ 6	Activision Blizzard, Inc.
11	Exhibit A to the Zaken Declaration	Document in its entirety	Google
12	Exhibit B to the Zaken Declaration	Document in its entirety	Google
13	Exhibit C to the Zaken Declaration	Document in its entirety	Google
14			
15	Exhibit D to the Zaken Declaration	Document in its entirety	Activision Blizzard, Inc.
16			

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that I executed this declaration on October 28, 2022 in New York, New York.

/s/ Lauren A. Moskowitz
Lauren A. Moskowitz